

MEMO ENDORSED



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July 18, 2025

BY ECF

Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

USDC SDNY
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Re: Johnson v. City of New York et al.,
22 Civ. 956 (ALC)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, assigned to represent the City of New York and Correction Officer Adelson ("Defendants") in the above referenced matter. Defendants write to respectfully request an approximate forty-five day extension of time to submit their motion for summary judgment from July 18, 2025, to September 5, 2025. This is the first request for an extension of this deadline. Due to plaintiff's incarcerated status, defendants were unable to ascertain his position on the instant request.

By way of background, the parties attended a pre-motion conference in anticipation of their motion for summary judgment on June 18, 2025. At the conference, the Court set the following deadlines:

- Defendants' Motion Due: July 18, 2025
- Plaintiff's Opposition Due: September 2, 2025
- Defendants' Reply Due: September 12, 2025

The Court also scheduled a telephonic status conference for August 5, 2025, at 4:00 pm. The reason for the conference was to confirm that plaintiff received a copy of his deposition transcript and a copy of the defendants motion. (See ECF No. 71).

Due to time sensitive issues in other cases, the undersigned requires additional time to draft and file Defendants motion. In the interest of fairness, Defendants further respectfully request that the Court afford plaintiff a corresponding extension of time to submit his opposition papers until October 20, 2025, *i.e.*, forty-five days after the defendants motion is filed, should the instant

request be granted, and an extension of time for defendants to submit their reply until October 30, 2025, *i.e.*, ten days after plaintiff's opposition is filed, should the instant request be granted. Therefore, if the instant request is granted, the new briefing schedule would be as follows:

- Defendants' Motion Due: September 5, 2025
- Plaintiff's Opposition Due: October 20, 2025
- Defendants' Reply Due: October 30, 2025

Furthermore, in the interest of judicial economy, defendants respectfully request a corresponding adjournment of the status conference scheduled for August 5, 2025, until a date and time that is convenient to the Court after September 5, 2025.

Defendants thank the Court for its time and consideration herein.

Respectfully submitted,

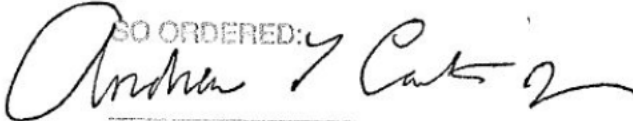
Mary Jane Anderson /s/
Mary Jane Anderson
Assistant Corporation Counsel
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cc: Glenn Johnson
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Defendants' request for an extension of time to file their motion for summary judgment is hereby **GRANTED**. The revised briefing schedule is as follows:

- Defendants' Motion Due: September 5, 2025
- Plaintiff's Opposition Due: October 20, 2025
- Defendants' Reply Due: October 30, 2025

Defendants' request for an adjournment of the status conference currently scheduled for August 5, 2025 (Dkt. No. 71) is **DENIED**. The Court will confirm Plaintiff's receipt of his deposition transcript at the conference currently scheduled for August 5th. At the conference, Defendants should be prepared to propose a date and time for another telephonic conference on a date after September 5, 2025 for the Court to confirm Plaintiff's receipt of their motion for summary judgment.

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

July 23, 2025